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Colleen McMahon

January 6, 2021

1/7/21

via ECF

The Honorable Colleen McMahon, Chief U.S.D.J.
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: Boshra Farid Youssef Bersoum, et al. v. Mustafa T.A. Aboteat, Fourth Deputy
Prime Minister and Head of Authorities, et al.
Civil Action No: 1:20-cv-08013-CM

Dear Chief Judge McMahon:

I am filing this letter to respectfully seek an adjournment of the Initial Pretrial Conference now set for Friday, January 22, 2021. I am participating in this matter as local counsel for three of my partners, Edward Shensky, Jeffrey Krawitz and Michael Ksiazek, who were lead counsel for the Plaintiffs in this matter when it was venued in the U.S. District Court for the Eastern District of Pennsylvania prior to its recent transfer to this Court. Procedurally, there was a Motion for Entry of Default Judgment pending at the time of transfer. No counsel have appeared for the defendants and none of the defendants has participated *pro se*.

I anticipate moving for the admission *pro hac vice* of Messrs. Shensky, Krawitz and Ksiazek, but there has been significant delay in receiving the Certificates of Good Standing from all jurisdictions in which they are admitted to practice. These Certificates are necessary for the motions to be filed. We understand these processing delays to be related to reduced staffing. Messrs. Shensky, Krawitz and Ksiazek are in the best position to discuss this matter and the related issues with the Court.

Your Honor's consideration of this request is appreciated.

Respectfully,

STARK & STARK
A Professional Corporation

By: /s/ Craig S. Hilliard
CRAIG S. HILLIARD, ESQ.

CSH/kaw

